

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jhave'll Moore,

Plaintiff,

v.

The Village of Maywood,
Maywood Police Department,
Officer Smith, and Officer Dolan,

Defendants.

No. 22-cv-1409

Judge: Hon. Edmund E. Chang

Mag. Judge: Hon Heather K. McShain

JURY TRIAL DEMANDED

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

Plaintiff Jhave'll Moore, by and through his undersigned counsel, respectfully requests that this Court extend the time for him to file a Reply on his Motion to Correct Date of Filing [Dkt. 6], and in support of this Motion states as follows:

1. On July 11, 2022, Plaintiff filed a Motion for Miscellaneous Relief, specifically, to correct the filing date of his Complaint. Dkt. 6.
2. On October 19, 2022, Defendants filed their Response to this Motion. Dkt. 21.
3. The Court previously set a briefing schedule establishing that Plaintiff's Reply would be due October 26, 2022. Dkt. 20.
4. On October 21, 2022, Plaintiff filed a Motion for an Extension of Time, until November 16, 2022, for his Reply, to allow for USPS correspondence from Danville Correctional

Center. Dkt. 21. This Court granted that Motion on October 25, 2022, and Plaintiff's Reply is currently due November 16, 2022. Dkt. 22.

5. Plaintiff's counsel met with Plaintiff via prison legal call on October 24 and November 1, 2022, and in between these meetings, Plaintiff mailed his counsel copies of the documentation he received from the Clerk of Court for the Northern District of Illinois after mailing his lawsuit from Cook County Jail last November.
6. The mail from Danville Correctional Center is apparently experiencing delays. This mail, despite being sent via USPS the week of October 24, 2022, did not arrive at Plaintiff's counsel's office until today, November 7, 2022.
7. Plaintiff and his counsel have another legal call scheduled for November 9, 2022, after which point Plaintiff will need to send additional correspondence to his counsel by USPS.
8. Given that the first correspondence took more than a week to arrive at Plaintiff's counsel's office, and perhaps almost two, there is a real chance that the second correspondence would not reach Plaintiff's counsel until after the current November 16, 2022 Reply deadline even if mailed immediately following the legal call.
9. In an abundance of caution, Plaintiff thus respectfully requests a second, three-week extension of time to Reply, until December 7, 2022, to allow time for USPS correspondence.
10. Plaintiff has made one prior request for an extension of time to Reply.
11. This Motion is brought in good faith, is not intended to cause undue delay, and no prejudice will result to the Defendants.

12. On November 7, 2022, Plaintiff's counsel conferred with counsel for Defendants, who indicated that they did not oppose the sought extension.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting a second extension of time for Plaintiff to Reply on his Motion to Correct the Date of Filing, until December 7, 2022.

Respectfully submitted,

/s/ Daniel E. Massoglia

One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Daniel Massoglia, an attorney, hereby certify that a copy of the above Motion was filed on November 7, 2022 using the CM/ECF system, which generates electronic notice to all counsel of record on this case.

Respectfully Submitted,

Daniel E. Massoglia

One of Plaintiff's Attorneys